

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Douglas V. Gratz,

Debtor.

Case No. 24-10376-PMM
Chapter 13

Motion to Reinstate Case


Debtor Douglas V. Gratz, through their attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on February 5, 2024. He has filed a plan and all schedules, statements, and other documents required by 11 U.S.C. §521(a)(1) and Fed. R. Bankr. P. 1007(b).
2. This case was recently dismissed on motion of the trustee for unreasonable delay and failure to provide his tax return to the trustee.
3. The Debtor has since provided his tax return to his attorney, and his attorney has provided it to the trustee.
4. The Debtor has also paid \$2,700 to the trustee, which is being held in escrow by his attorney and will be sent to the trustee today.
5. The Debtor requests that this case be reinstated.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: July 19, 2024

CIBIK LAW, P.C.
Attorney for Debtor

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